

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

Judy Larson, Janelle Mausolf, and Karen Reese, individually and on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

Allina Health System; the Allina Health System Board of Directors; the Allina Health System Retirement Committee; the Allina Health System Chief Administrative Officer; the Allina Health System Chief Human Resources Officer; Clay Ahrens; John I. Allen; Jennifer Alstad; Gary Bhojwani; Barbara Butts-Williams; John R. Church; Laura Gillund; Joseph Goswitz; Greg Heinemann; David Kuplic; Hugh T. Nierengarten; Sahra Noor; Brian Rosenberg; Debra L. Schoneman; Thomas S. Schreier, Jr.; Abir Sen, Sally J. Smith; Darrell Tukua; Penny Wheeler; Duncan Gallagher; Christine Webster Moore; Kristyn Mullin; Steve Wallner; John T. Knight; and John Does 1–20,

Defendants.

Civil Action No.: 17-3835-SRN-SER

**PLAINTIFFS' MOTION FOR AN  
AWARD OF ATTORNEYS' FEES,  
REIMBURSEMENT OF  
EXPENSES, AND CASE  
CONTRIBUTION AWARDS FOR  
THE CLASS REPRESENTATIVES**

Plaintiffs Judy Larson, Janelle Mausolf, and Karen Reese (collectively, “Named Plaintiffs”), by and through their undersigned counsel, respectfully move this Court for an award of attorneys’ fees, reimbursement of expenses, and Case Contribution Awards to

each of the Class Representatives in connection with the Settlement achieved in this matter.<sup>1</sup>

Specifically, Plaintiffs request that the Court: (1) award Class Counsel the amount of \$808,252.50 in attorneys' fees; (2) award Class Counsel the amount of \$12,413.78 as reimbursement of litigation expenses; and (3) award Named Plaintiffs the amount of \$5,000 each as an incentive award in recognition of their work on behalf of the Settlement Class in this litigation. The grounds for this Motion are set forth in Plaintiffs' accompanying memorandum of law and counsel declarations.

WHEREFORE, Plaintiffs request that the Motion be granted and that they have such other and further relief as the Court deems just and proper.

Dated: March 10, 2020

Respectfully submitted,

**CAPOZZI ADLER, P.C.**

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<sup>1</sup> The Settlement Agreement was previously submitted as Exhibit 1 to the Declaration of Mark K. Gyandoh in support of Plaintiffs' Unopposed Motion for Preliminary Approval of the Settlement Agreement [ECF 96-1]. Undefined capitalized terms herein have the same meaning as in the Settlement Agreement.

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***Class Counsel***

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of March 2020, I electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system which will send a notification to all counsel of record in this Action.

/s/ Mark K. Gyandoh  
Mark K. Gyandoh